

ORIGINAL

INTERVENTION

OPEN MEETING AGENDA ITEM



0000135316

Timothy M. Hogan (004567)
ARIZONA CENTER FOR LAW
IN THE PUBLIC INTEREST
202 E. McDowell Rd., Suite 153
Phoenix, Arizona 85004
(602) 258-8850

RECEIVED

2012 MAR 21 P 4:18

AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

DOCKETED

MAR 21 2012

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF)
TUCSON ELECTRIC POWER COMPANY FOR)
APPROVAL OF ITS 2011-2012 ENERGY)
EFFICIENCY IMPLEMENTATION PLAN)
_____)

DOCKET NO. E-01933A-11-0055

**MOTION TO INTERVENE
OF WESTERN RESOURCE
ADVOCATES**

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), Western Resource Advocates ("WRA") hereby moves to intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a non-profit regional environmental law and policy center serving the Rocky Mountain and Desert Southwest states. WRA has been involved in proceedings before the Commission since about 1990 and has been granted intervenor status in numerous dockets. It also participated in the rulemaking docket regarding adoption of the Energy Efficiency Standard. WRA has staff members and multiple supporters who live and recreate in Arizona and/or are TEP electric ratepayers.

1 2. WRA's Energy Program promotes policies and programs designed to encourage
2 the development of clean energy technologies, energy efficiency, renewable resources,
3 distributed generation, and other measures that help reduce the environmental impacts of
4 meeting the demand for energy services, while minimizing costs and risks to ratepayers.

5 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding.

6 4. WRA requests that all pleadings, correspondence, discovery and other documents
7 be served on the following:

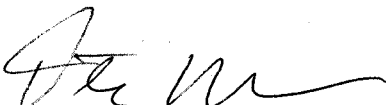
8 Timothy M. Hogan
9 Arizona Center for Law in the Public Interest
10 202 E. McDowell Road, Suite 153
11 Phoenix, Arizona 85004
12 (602) 258-8850
13 FAX: (602) 258-8757
14

15 David Berry
16 Western Resource Advocates
17 P. O. Box 1064
18 Scottsdale, Arizona 85252-1064
19 (480) 990-7209 (fax is the same)
20 azbluhill@aol.com

21 WHEREFORE, WRA respectfully requests that the Commission issue an order granting
22 its Motion to Intervene in the above-captioned proceeding.

23 DATED this 21st day of March, 2012.

24 ARIZONA CENTER FOR LAW IN
25 THE PUBLIC INTEREST

By 
Timothy M. Hogan
202 E. McDowell Rd., Suite 153
Phoenix, Arizona 85004
Attorneys for Western Resource
Advocates

1 ORIGINAL and 13 COPIES of
2 the foregoing filed this 21st day
3 of March, 2012, with:

4 Docketing Supervisor
5 Docket Control
6 Arizona Corporation Commission
7 1200 W. Washington
8 Phoenix, AZ 85007

9 COPIES of the foregoing
10 Electronically mailed this
11 21st day of March, 2012 to:

12 All Parties of Record

13
14
15
16
17
18
19
20
21
22
23
24
25

